

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	In Chapter 7
)	Case No. 18 B 35437
STEVEN D. ZARLING,)	Honorable LaShonda A. Hunt
)	Motion Date: May 30, 2019
Debtor.)	Motion Time: 10:00 a.m.

NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE THAT on May 30, 2019, at the hour of 10:00 a.m., a **SECOND ROUTINE MOTION OF LINDA NELSON TO EXTEND TIME TO OBJECT TO DISCHARGE AND DETERMINE THE DISCHARGEABILITY OF DEBT** shall be heard before the Honorable LaShonda A. Hunt of the United States Bankruptcy Court for the Northern District of Illinois, Courtroom 719, 219 South Dearborn, Chicago, Illinois. A copy of same is attached hereto and thereby served upon you. You may appear if you so see fit.

NOTE THAT THE PROPOSED ORDER APPENDED TO THIS MOTION MAY BE ENTERED BY THE JUDGE WITHOUT PRESENTMENT IN OPEN COURT UNLESS A PARTY IN INTEREST NOTIFIES THE JUDGE OF AN OBJECTION THERETO PURSUANT TO LOCAL RULE 9013-9.

GOLAN CHRISTIE TAGLIA LLP

AFFIDAVIT OF SERVICE

I, Robert R. Benjamin, an attorney, certify that I caused the foregoing Notice of Motion and Second Motion to Extend Time to Object to Discharge and Determine the Dischargeability of Debt to be served upon the parties who receive notice via CM/ECF, by e-mail and first class mail postage prepaid sent from 70 W. Madison Street, Suite 1500, Chicago, IL 60602 on May 21, 2019.

/s/Robert R. Benjamin

Robert R. Benjamin

GOLAN CHRISTIE TAGLIA LLP
Attorneys for Movant
70 W. Madison Street, Suite 1500
Chicago, Illinois 60602
312-263-2300

SERVICE LIST

Richard J Mason
McGuire Woods LLP
77 West Wacker Drive
Suite 4100
Chicago, IL 60601
Via CM/ECF

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541
Via CM/ECF

Bank of America
Bankruptcy Department
PO Box 982284
El Paso, TX 79998-2238
Via Regular Mail

Capital One
1500 Capital One Way
Richmond, VA 23060
Via Regular Mail

Care Rehab & Orthopaedic Products
PO Box 580
Mc Lean, VA 22101
Via Regular Mail

Citi
PO Box 6500
Sioux Falls, SD 57117-6500
Via Regular Mail

Citibank NA
PO Box 769006
San Antonio, TX 78245
Via Regular Mail

Commerce Bank
PO Box 419248
Kansas City, MO 64141
Via Regular Mail

Steven D. Zarling
c/o David M Siegel
David M. Siegel & Associates
790 Chaddick Drive
Wheeling, IL 60090
Via CM/ECF

Alexian Brothers Medical Center
800 Biesterfield Rd.
Elk Grove Village, IL 60007
Via Regular Mail

Barclays Bank Delaware
125 S. West St.
Wilmington, DE 19801
Via Regular Mail

Cap1/Best Buy
PO Box 6497
Sioux Falls, SD 57117
Via Regular Mail

Chase
PO Box 15298
Wilmington, DE 19850
Via Regular Mail

Citi
PO Box 6241
Sioux Falls, SD 57717
Via Regular Mail

Commerce Bank
PO Box 411036
Kansas City, MO 64141-1036
Via Regular Mail

Commerce Bank
1045 Executive Parkway
St. Louis, MO 63141
Via Regular Mail

Creditors Discount & Audit (RETA)
415 E. Main St.
PO Box 213
Streator, IL 61364
Via Regular Mail

Discover Bank
PO Box 15316
Wilmington, DE 19850
Via Regular Mail

Dr. Grochowski
911 N. Plum Grove Rd. Unit B
Schaumburg, IL 60173
Via Regular Mail

Fingerhut
PO Box 1250
Saint Cloud, MN 56395-1250
Via Regular Mail

FINGERHUT/WEBBANK
6250 Ridgewood Rd.
Saint Cloud, MN 56303
Via Regular Mail

Glen Oaks Hospital
PO Box 4657
Hinsdale, IL 60522
Via Regular Mail

Illinois Bone & Joint
135 S LaSalle Dpt. 1052
Chicago, IL 60674-1052
Via Regular Mail

Illinois Spine Institute
1990 E. Algonquin Rd.
Schaumburg, IL 60173
Via Regular Mail

Midwest Sports Medicine
901 W. Biesterfield Rd., Ste. 300
Elk Grove Village, IL 60007
Via Regular Mail

O'Connor Nakos
120 North LaSalle Street, 35th Floor
Chicago, IL 60602
Via Regular Mail

OAD Orthopaedics Ltd
27650 Ferry Rd
Warrenville, IL 60555
Via Regular Mail

Partners in Primary Care
1545 Hicks Rd.
Rolling Meadows, IL 60008
Via Regular Mail

Radiological Consult. of Woodstock
9410 Compubill Drive
Orland Park, IL 60462
Via Regular Mail

Rehabilitation Institute of Chicago
1030 N. Clark St., #500
Chicago, IL 60610
Via Regular Mail

Rush University Medical Center
Rush Behavioral Systems
2001 Butterfield Rd., #220
Downers Grove, IL 60515
Via Regular Mail

Sears/CBNA
P.O. BOX 6282
Sioux Falls, SD 57117
Via Regular Mail

Sherman Hospital
PO Box 582663
Modesto, CA 95358
Via Regular Mail

Capital One Bank
10700 Capital One Way
Richmond, VA 23060
Via Regular Mail

Syncb/Amazon PLCC
PO Box 965015
Orlando, FL 32896-5015
Via Regular Mail

Discover Bank
PO Box 3025
New Albany, OH 43054
Via Regular Mail

Syncb/Car Care Easypay
PO Box 965001
Orlando, FL 32896
Via Regular Mail

Syncb/Care Credit
PO Box 965061
Orlando, FL 32896-5061
Via Regular Mail

Syncb/Pay Pal
PO Box 965005
Orlando, FL 32896-5005
Via Regular Mail

Syncb/Sam's Club DC
PO Box 965060
Orlando, FL 32896-5060
Via Regular Mail

Syncb/Walmart
PO Box 965024
Orlando, FL 32896-5021
Via Regular Mail

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541
Via Regular Mail

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	In Chapter 7
)	Case No. 18 B 35437
STEVEN D. ZARLING,)	Honorable LaShonda A. Hunt
)	Motion Date: May 30, 2019
Debtor.)	Motion Time: 10:00 a.m.

**SECOND ROUTINE MOTION OF LINDA NELSON TO EXTEND TIME FOR
FILING OBJECTION TO DISCHARGE AND/OR DISCHARGEABILITY
PURSUANT TO 11 U.S.C. §§ 727 AND 523**

Creditor, LINDA NELSON (“Nelson”), requests that the Court enter its proposed order extending the last date for Nelson to file an objection to the discharge and/or dischargeability of Debtor, Steven D. Zarling. In support thereof, Nelson states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1331. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicate for the relief requested in this Motion is Federal Rule of Bankruptcy Procedure 4004(b).

RELIEF REQUESTED

3. On December 26, 2018, Debtor filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (“Bankruptcy Code”). Subsequently, Richard J. Mason was appointed Trustee.

4. The original last day to file an objection to the discharge and/or dischargeability was April 1, 2019. On April 10, 2019, this Court entered an order granting Nelson’s motion to extend the Objection Deadline to June 1, 2019 (the “Objection Deadline”) [**Docket No. 17**].

5. Pursuant to Rule 4004(b), the Court may, on the motion of any party in interest, after notice and a hearing, for cause extend the time to file a complaint objecting to discharge, which motion shall be filed before the time has expired.

6. Local Rule 9013-9 provides that a motion to extend the time for objecting to discharge and/or dischargeability may be designated as a “routine motion” in which case the Court may enter the proposed order without presentment unless the Court is notified of an objection.

7. Nelson has not completed her investigation and requires additional time to complete her due diligence. Specifically, Nelson is investigating whether the Debtor should be denied discharge or his debt to Nelson be declared non-dischargeable due to fraudulent transfers. Therefore, cause exists to extend the objection deadline. Otherwise, Nelson may be forced to file a premature adversary complaint which might needlessly increase the costs of litigation for both the Debtor and Nelson.

8. The requested extension is without prejudice to Nelson’s right to seek a further extension or Debtor’s right to object thereto.

9. This is the second request to extend time. It is not interposed for an improper purpose or to delay these proceedings.

10. Notice of this Motion has been served on all parties of record entitled to notice in the case.

WHEREFORE, Creditor, LINDA NELSON, prays this Honorable Court enter an order extending the last date for her to object to Debtor’s discharge and/or dischargeability to and through July 1, 2019 and for such other and further relief as may be appropriate.

Dated: May 21, 2019

LINDA NELSON, Movant

By: Robert R. Benjamin
One of her attorneys

Robert R. Benjamin (ARDC #0170429)
Beverly A. Berneman (ARDC #6189418)
Anthony J. D'Agostino (ARDC #6299589)
GOLAN CHRISTIE TAGLIA LLP
Attorneys for Movant
70 W. Madison Street, Suite 1500
Chicago, Illinois 60602
312-263-2300
rrbenjamin@gct.law
baberneman@gct.law
ajdagostino@gct.law